

### REMARKS

The above amendments and these remarks are responsive to the Office action dated September 25, 2003. Claims 1-36 are pending in the application. In the Office action, the Examiner rejected claims 1-36 under 35 U.S.C. 103(a). In this response, applicants have amended claims 1, 14, 24, 30 and added new claims 37-39. In view of the amendments above, and the remarks below, applicants respectfully request reconsideration of the application under 37 C.F.R. § 1.111 and allowance of the pending claims.

### Rejections under 35 USC § 103

The Examiner rejects claims 1-36 under 35 U.S.C. 103(a) as being unpatentable over Strandwitz et al. (U.S. Patent No. 6,522,352). "To establish a prima facie case of obviousness, three basic criteria must be met. First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations." MPEP 2143.

Applicants believe there is no motivation within the Strandwitz reference to modify the reference to suggest applicant's claimed invention. As described in applicant's specification the present application relates to an image-rendering device for an image projector that is "capable of transmitting an image from a plurality of independent sources." (pg. 1, lines, 4-5). As discussed in the Background section, typically "a user must physically connect their computer, such as a personal computer, to the image projector. This process may be cumbersome and frustrating to a presenter." (pg. 1, lines 12-16) Moreover, the use of numerous cables and/or adapters may make it difficult to have multiple presenters use the same projector. (pg. 1, lines 20-22 - pg. 2, lines 1-9) "For example, when transitioning from a first presenter to a second presenter, the first presenter must physically connect a computer to an image projector using the appropriate adapters and cables. The first presenter then typically seats himself or herself close to the image projector. When the second presenter wants to present their presentation, the first presenter may have to disconnect the computer from the image projector, enabling the second presenter to connect a new computer to the image projector possibly using different adapters and

cables. Typically, the first presenter may have to change seats with the second presenter to provide room for the second presenter to connect to the image projector. This transition between the first and second presenter may take a significant period of time and be disruptive to a meeting.” (pg. 1, lines 20-22 - pg. 2, lines 1-9)

Applicant’s device addresses the above issues. Applicant’s device enables multiple users to easily connect to an image projector (such as through a wireless network), regardless of the computing platform used by the user or the storage location or format of the presentation. Moreover, applicant’s device enables a presenter to run a presentation from anywhere in a room. Furthermore, other peripheral devices, such as printers, scanners, cameras, etc. may be easily connected to the image projector using applicant’s device.

In contrast to applicant’s disclosure, Strandwitz discloses a wireless camera system and a method of managing bandwidth capability over the wireless camera system. Strandwitz does not address any of the above issues related to projection devices, and as such provides no motivation, suggestion or teaching to modify Strandwitz to obtain applicant’s image-rendering device for projection devices as recited and described.

A more detailed look at Strandwitz shows that the reference provides a significantly different system and method than applicant’s device. Operation of Strandwitz’s system includes capturing images by a camera 130, encoding the images, transmitting the images and displaying the images on a video monitor. See col. 3, lines 17-29. Images may be transferred to a base station device or gateway device which controls access to devices on a network. As stated by Strandwitz, “a goal is to provide a bandwidth usage strategy that will accommodate the maximum number of devices in a wireless network with highest possible transmission reliability and the level of video quality necessary for a given application.” Col. 7, lines 14-18. For ease of understanding the disclosure in Strandwitz, the campus security example of Fig. 7 from Strandwitz is shown below.

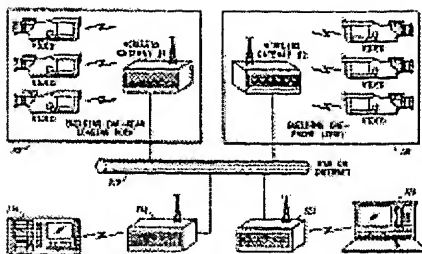


FIG. 7

As shown above, Strandwitz's campus security system example includes wireless devices (video cameras) arranged in groups 700, 701. (col. 10, lines 26-30). The wireless devices are linked via network 710 to wireless gateways 716, 721 to security monitoring stations 715, 720 (col. 10, lines 28-34). Strandwitz describes that a user monitoring the surveillance area from one of the security monitoring stations 715, 721 may wish to examine a particular camera with greater scrutiny and may instruct the cameras to change their transmission rates and types. (See col. 11, lines 45-55).

The above-example illustrates the combination wireless camera system intended by Strandwitz. The camera system taught in Strandwitz generally describes a group of interconnected bodies, in contrast to applicant's single-bodied image-rendering device. As described and shown in the figures, the Strandwitz system includes separate components which may be linked to operate as a wireless camera system. Additional network devices may be linked through conventional networks to various devices within the system. Thus, although Strandwitz's multi-part system includes some components of applicant's recited claims, such components are not in a single body which is adapted to be coupled to an image projector to enable different data transfer sources to transmit images to the image projector. "The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination." In re Mills, 916 F.2d 680 (Fed. Cir. 1990). Therefore, because there is no teaching, suggestion or motivation within Strandwitz of the image-rendering device of claims 1-36, applicant's respectfully request the withdrawal of these rejections.

Turning now to the specific claims, applicants note that amendments have been made to clarify the recited invention. Support for the claims is clearly found in the applicant's specification and drawings.

Specifically, claim 1 recites “an image receiver adapted to alternatively receive a first interchangeable data transfer device and a second interchangeable data transfer device.” The data transfer device recited is described in applicant’s specification. Specifically, “data transfer device 26 may be a card, an expansion board, an adapter or other suitable device that is adapted to be plugged into a slot 28 within image-rendering device 14.” (page 7, lines 2-4 of applicant’s specification).

Strandwitz does not teach or suggest an image-rendering device with an image receiver adapted to alternatively receive interchangeable data transfer devices. The Examiner indicates that the image receiver (encoding/decoding modules 200, 210 and 220) is adapted to receive such data transfer devices. However, it is unclear which devices operate in Strandwitz as the “interchangeable data transfer devices.” Nor is it clear how any device in Strandwitz is specifically adapted to alternatively receive such data transfer devices.

The Examiner argues that it would have been obvious to one of ordinary skill in the art to substitute any of the multi-media gateways of Figure 4, 6 or 7 for the network gateway 170 of Figure 2. Although applicant’s disagree that it would be obvious to one of ordinary skill in the art, substitution of the gateways does not teach or suggest the applicant’s recited body with an image receiver adapted to “alternatively receive” interchangeable data transfer devices.

Moreover, claim 1 further recites a body with an image receiver AND a projector connector. Strandwitz does not teach the use of an image-projector device, nor a single body with both an image receiver and a projector connector adapted to physically connect the body to the image projector. To establish a prima facie case of obviousness, the prior art reference must teach or suggest all the claim limitations. There is no teaching or suggestion within Strandwitz of a single body with both an image receiver (as recited) AND a projector connector that is adapted to physically couple the body to an image projector.

Thus, for at least the above reasons, applicants submit that the rejections to independent claim 1 should be withdrawn. Claims 2-13 include all the limitations of claim 1, and should be allowable, for at least the same reasons as claim 1.

Similarly, independent claim 14 recites a “portable image-rendering device” including a wireless receiver, a projector connector adapted to physically couple the image-rendering device to an image projector and a processor. Strandwitz’s multiple component and multiple network camera system does not teach, suggest or disclose the portable image-rendering device for an

image projector as recited. Thus, for at least the above reasons, applicants submit that the rejections to independent claim 14 should be withdrawn. Claims 15-23 include all the limitations of claim 14, and should be allowable, for at least the same reasons as claim 14.

Likewise, independent claim 24 recites a portable image-rendering device for an image projector including a peripheral device connector, a projector connector and a processor. For the reasons described above, applicants submit that the rejections to independent claim 24 should be withdrawn. Claims 25-29 include all the limitations of claim 24, and should be allowable, for at least the same reasons as claim 24.

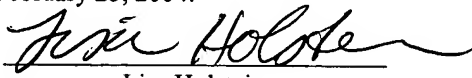
Independent claim 30 recites an image display system including “an image projector adapted to display an image and a portable image-rendering device having a body adapted to be physically coupled with the image projector.” Again, Strandwitz does not disclose, teach or suggest an image projector, much less a portable-image rendering device adapted to be physically coupled with the image projector. For the reasons described above, applicants submit that the rejections to independent claim 30 should be withdrawn. Claims 30-36 include all the limitations of claim 30, and should be allowable, for at least the same reasons as claim 30.

For the sake of completeness, applicants respectfully disagree with the Examiner’s comments in regards to each of the dependent claims and reserve the right to address each of these comments in a later response. Briefly, applicants disagree that Strandwitz alone teaches, suggests or discloses any one of the dependent claims. As discussed above, each of the dependent claims should be allowable as depending from an allowable independent claim.

Applicants believe that this application is now in condition for allowance, in view of the above amendments and remarks. Accordingly, applicants respectfully request that the Examiner issue a Notice of Allowability covering the pending claims. If the Examiner has any questions, or if a telephone interview would in any way advance prosecution of the application, please contact the undersigned attorney of record

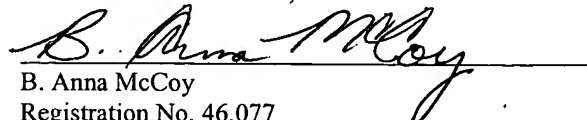
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Respectfully submitted,

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